

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

---

MICHAEL GOZA,

Plaintiff,

v.

Case No. 17-cv-2873

MEMPHIS LIGHT, GAS AND WATER DIVISION,  
a division of the City of Memphis, Tennessee,

Defendant.

---

**PLAINTIFF'S MOTION FOR AWARD OF ATTORNEY'S FEES AND COSTS**

---

On June 14, 2019, the Court entered an Order and Opinion in favor of Plaintiff regarding his discrimination claims based on his protected speech as well as his race. (Doc. 122). On June 24, 2019, the Court entered a judgment for Plaintiff. (Doc. 126). Accordingly, Plaintiff moves for an award of attorney's fees and costs as authorized by 42 U.S.C. §§ 1981 and 1983. See 42 U.S.C. § 1988(b). In support of this motion, Plaintiff relies on the memorandum of facts and law filed contemporaneously with this motion, as well as declarations from the Plaintiff's attorneys, Bryce W. Ashby, Donald A. Donati, William B. Ryan and Janelle C. Osowski. Plaintiff also relies on declarations from attorneys Robert L.J. Spence, Jr., Dan M. Norwood and Jeff Rosenblum.

Wherefore, Plaintiff requests that the Court grant Plaintiff's motion for award of attorney's fees in the amount of \$259,890.00 and costs in the amount of \$10,692.88.

Respectfully submitted,

**DONATI LAW, PLLC**

/s/Bryce W. Ashby

Donald A. Donati #8633

William B. Ryan #20269

Bryce W. Ashby #26179

1545 Union Ave.

Memphis, TN 38104

Phone: 901/278-1004

Facsimile: 901/278-3111

billy@donatilaw.com

bryce@donatilawfirm.com

Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document has been served via the Court's ECF system on counsel for Defendants on July 18, 2019.

/s/Bryce W. Ashby